

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

July 8, 1993



TO: Ms. Claudia Kerbawy  
Chief, SMU #2  
Superfund Section  
Environmental Response Division

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SUBJECT: Possible Buried Drums in the Albion-Sheridan Landfill  
Superfund Site, Calhoun County, Michigan

Historical documentation indicates that the site may have been the final disposal location for many drums of liquid and solid waste of various chemical composition. In the spring of 1992, during the review of the draft work plan for the RI, MDNR provided comments to the EPA stating that a site Magnetometer (Mag) survey should be conducted within the guidelines suggested by MDNR and that, if so indicated, test pitting should be employed. We could not get EPA to commit to the Mag survey being conducted along with the other geophysical survey being planned (EM-31 and 34). They instead suggested that the Mag survey may be conducted if the EM-31 and 34 surveys showed a need to do so. EPA would also not commit to test pitting and were evasive when we raised the subject. One excuse used was that they didn't think that a back hoe that could dig that deep (20-35 feet). A wheeled hoe can't but a track hoe can.

The work plan was finalized, without our comments being addressed and the field work at the site began in August of 1992. Following the interpretation of the data gathered from the EM surveys, EPA concluded that their version of the Mag survey should be run, once again over our objections to the grid pattern they established. The field work concluded and a Draft Phase I Summary Report was prepared by WW Engineering, the EPA consultant. A meeting was scheduled for June 30, 1993 to discuss the report. Prior to the meeting, ERD Geo Services staff Margie Frisch reviewed the Mag survey results and provided comments. The gist of her comments was that the survey was very flawed and that the data gathered was invalid. During the meeting the subject came around to the Mag survey and the possibility of "hot spots", EPA once again proved to be evasive and finally stated that the Mag survey will stand,

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will not be re-run according to MDNR specs, that the survey did not indicate the presence of buried drums or "hot spots" and that test pitting would not be conducted. Bob Delaney was at the June 30 meeting with me and we both reiterated our concerns that the EPA was purposely ignoring the possibility that "hot spots" may be in existence and that they were conducting the site investigation in such a manner that "hot spots" would not be discovered and therefore EPA would not have to deal with the issue. Bob and I posed the question to EPA that if MDNR did it's own Mag survey and was able to document that "hot spots", would EPA accept the data as valid and if so indicated, would they conduct test pitting to verify the Mag results. Once again, EPA was elusive and would not commit to that course of action.

The main issues for this site at this time are:

- 1) Should MDNR conduct it's own Mag survey, utilizing Geo Services Section staff and funded with State funds or should we accept the EPA results and move ahead with the RI?
- 2) If we do conduct our own Mag survey, and the results indicate hot spots are present, do we conduct our own test pitting investigation if EPA refuses to do so?

As of the writing of this memo, the EPA is moving ahead with the finalization of the Phase I Summary Report as the RI report. If EPA is unwilling, through the dispute resolution process to correct the shortcomings of the Mag survey, we will need to seek management advice as to whether or not we should move ahead with our own Mag survey.